

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Pharo Gaia Fund Ltd. and Pharo Macro
Fund Ltd.

Plaintiff	Case Number
vs.	19-cv-3123
Bolivarian Republic of Venezuela	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Casa Express Corp.

Plaintiff	Case Number
vs.	18-cv-11940
Bolivarian Republic of Venezuela	
Defendant	

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

The complaint was filed December 18, 2018. On April 1, 2019, the clerk entered a certificate of default. On April 4, 2019, the district court ordered plaintiff by May 2, 2019 to serve the Bolivarian Republic of Venezuela pursuant to 28 U.S.C. sec. 1608, and then refile plaintiff's papers to initiate a default judgment proceeding.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Both the earlier-filed Casa Express case and the later-filed Pharo case raise breach-of-contract claims concerning principal and interest payments on Venezuelan sovereign debt. Both cases concern, inter alia, payments on a 13.625% global note due in 2018 (ISIN No. USP9395PAA95).

In light of these overlapping factual and legal questions, and to conserve judicial resources, the Bolivarian Republic of Venezuela respectfully requests that these cases be marked as related.

Signature: /s/ Kent A. Yalowitz
Arnold & Porter Kaye Scholer LLP

Date: April 8, 2019

Firm: _____